Illinois Tool Works Inc. Corporate Headquarters 8501 West Higgins Road Chicago, Illinois 60631 Telephone 312.693.3040 Direct Dial 312.399.4827 Telex 275213 ITWC UR Cable ILLICORP-CGO Philip S. Dallosto Senior Attorney and Assistant Secretary





June 7, 1988

Ms. Susan Swales 5HE-12 U.S. EPA - Region V Waste Management Division CERCLA Enforcement Section 230 South Dearborn Street Chicago, IL 60604

Re: Ninth Avenue Dump, Gary, Indiana U.S. Scrap, Chicago, Illinois

Dear Ms. Swales:

Attached please find Illinois Tool Works Inc.'s response to the information request submitted by USEPA with respect to the aforementioned sites.

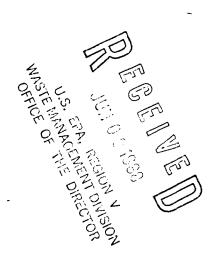
We apologize for our delay in responding to your information request.

Very truly yours,

Philip S. Dallosto

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#### ANSWERS TO INFORMATION REQUEST

#### QUESTION 1

Identify all persons, including yourself, who may have arranged for disposal or treatment or arranged for transportation for disposal or treatment of waste materials, including hazardous substances, at the Sites or to the Sites, or who may have arranged for disposal through any of the following persons or organizations:

1) Steve Martell, 2) U.S. Scrap Corp., 3) Liquid Engineering, 4) U.S. Drum Corp., 5) U.S. Drum Disposal, 6) David Head. In addition, identify the following:

- a. The persons with whom you or such other person made such arrangements;
- b. Every date on which such arrangements took place;
- c. For each transaction, the nature of the waste material or hazardous substance, including the chemical content, characteristics, physical state (e.g., solid, liquid), and the process for which the substance was used or the process which generated the substance;
- d. The owner of the waste materials or hazardous substances so accepted or transported;
- e. The quantity of the waste materials or hazardous substances involved (weight or volume) in each transaction and the total quantity for all transactions;
- f. All tests, analyses, and analytical results concerning the waste materials;
- g. The person(s) who selected the Sites as the place to which the waste materials or hazardous substances were to be transported;
- h. The amount paid in connection with each transaction, the method of payment, and the identity of the person from whom payment was received;
- i. Where the person identified in g., above, intended to have such hazardous substances or waste materials transported and all evidence of this intent;
- j. Whether the waste materials or hazardous substances involved in each transaction were transhipped through, or were stored or held at, any intermediate site prior to final treatment or disposal;

- k. What was actually done to the waste materials or hazardous substances once they were brought to the Sites;
- 1. The final disposition of each of the waste materials or hazardous substances involved in such transactions.

#### **ANSWER**

Illinois Tool Works Inc. has not discovered any independent information, written or oral, that would substantiate its involvement at either the Ninth Avenue site in Gary, Indiana or the U.S. Scrap site in Chicago, Illinois. Illinois Tool Works Inc. will continue its investigation and will supplement its answer to this question with any additional information it may learn that is responsive to the question.

#### **QUESTION 2**

Provide copies of all shipping documents, or other business documents including receipts relating to the transportation, storage and/or disposal of waste material at the above referenced Sites or with the following businesses and persons:

U.S. Scrap Corp.
Liquid Engineering
U.S. Drum Corp.
U.S. Drum Disposal
Steve Martell
David Head

#### **ANSWER**

See answer to Question Number 1 above.

### QUESTION 3

Provide a list and description of all liability insurance coverage that is or was carried by you, including any self-insurance provisions that related to hazardous substances and/or the Sites identified above:

The relevant time period for this information is 1965 to 1977, inclusive.

#### **ANSWER**

During the period of January 1, 1965 to January 1, 1978, Illinois Tool Works Inc. purchased primary and excess liability insurance from various insurance companies. All of the policies were issued with conventional I.S.O. forms generally in use by the insurance industry at that time.

A summary of insurance carriers and policy limits is included with this material.

## ILLINOIS TOOL WORKS INC.

# SUMMARY OF INSURANCE

11/1/64 το 11/1/65	Primary	Aetna Casualty & Surety	300,000 BI/100,000 PD
	Excess	Lloyds	3 million excess of primary
11/1/65 to 1/1/66	Primary	Aetna Casualty & Surety	300,000 BI/100,000 PD
	Excess	Lloyds	3 million excess of primary
1/1/66 to 1/1/67	Primary	Aetna Casualty & Surety	300,000 BI/100,000 PD
	Excess	Aetna Casualty & Surety	5 million excess of primary
1/1/67 to 1/1/68	Primary	Aetna Casualty & Surety	300,000 BI/100,000 PD
	Excess	Aetna Casualty & Surety	5 million excess of primary
1/1/68 to 1/1/69	Primary	Aetna Casualty & Surety	1 million BI and PD
	Excess	Aetna Casualty & Surety	5 million excess of primary
1/1/69 to 1/1/70	Primary	Aetna Casualty & Surety	300,000 BI/1,000,000 PD
	Excess	Employers	10 million excess of primary
1/1/70 to 1/1/71	Primary	Aetna Casualty & Surety	300,000 BI/1,000,000 PD
	Excess	Employers	10 million excess of primary
1/1/71 to 1/1/72	Primary	Aetna Casualty & Surety	300,000 BI/1,000,000 PD
	Excess	Employers	10 million excess of primary
8/9/71 to 1/1/72	Excess	Employers	Additional 10 million excess
1/1/72 to 8/15/74	Primary Excess	Insurance Company of N.A. Midland and various other companies	250,000 BI/1,000,000 PD 50 million excess of primary
	Primary	Insurance Company of N.A.	250,000 BI/1,000,000 PD
8/15/74 to 1/1/75	Primary Excess	Insurance Company of N.A. Home Insurance and various other companies	250,000 BI/1,000,000 PD 50 million excess of primary
1/1/75 to 2/1/76	Primary Excess	Insurance Company of N.A. Home Insurance and various other companies	250,000 BI/1,000,000 PD 50 million excess of primary
2/1/76 to 2/1/78	Primary Buffer Excess	Travelers Columbia Casualty Home Insurance and various other companies	500,000 BI and PD 500,000 BI and PD 50 million excess of primary

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